

*February 06, 2025*

Nathan Ochsner, Clerk of Court

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION****UNITED STATES OF AMERICA****VS.****BRITNI MARIE JOHNSON**§  
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§  
§  
§**CRIMINAL NO. 4:25-cr-0034****MAGISTRATE NO. H-24-mj-332****INDICTMENT**

The United States Grand Jury charges:

At all times material herein:

1. The Federal Deposit Insurance Corporation (FDIC) was an agency of the federal government which insured the deposits of member banks against loss up to \$250,000 with the purpose of preventing their collapse and instilling public confidence in the nation's banking institutions.
2. Truist Bank, including its branches, was a financial institution the deposits of which were insured by the FDIC.
3. Bank of America, including its branches, was a financial institution the deposits of which were insured by the FDIC.

**COUNTS 1- 2****(Bank Fraud - 18 U.S.C. § 1344)****A. INTRODUCTION**

1. The Grand Jury adopts, realleges, and incorporates the allegations in paragraphs 1-3 of the Introduction of this Indictment as if set out fully herein.

**B. THE SCHEME AND ARTIFICE**

2. From on or about July 1, 2023, and continuing until at least on or about August 8, 2024, in the Houston Division of the Southern District of Texas and elsewhere,

**BRITNI MARIE JOHNSON,**

Defendant herein, did knowingly execute and attempt to execute a scheme and artifice to defraud Truist Bank and Bank of America, financial institutions the accounts of which were insured by the FDIC, and to obtain money, funds, and property under the custody and control of the above-listed financial institutions, by means of false and fraudulent pretenses, representations, and promises in violation of Title 18, United States Code, Section 1344 (Bank Fraud).

**C. THE MANNER AND MEANS OF THE SCHEME AND ARTIFICE**

The manner and means of the conspiracy were as follows:

3. The conspirators unlawfully acquired United States Postal Service arrow keys or made counterfeit arrow keys.

4. The conspirators stole mail from the mailboxes of others. They used the unlawfully acquired arrow keys to access the mailboxes or other illegal means of entry.

5. The conspirators browsed the stolen mail for checks, credit cards, financial documents or other letters containing the personal identifying information (PII) of others.

6. The conspirators made counterfeit identification documents such as Texas driver's licenses, identification cards and temporary paper identification cards.

7. The conspirators used the counterfeit identification documents to pass counterfeited, forged and stolen checks, present stolen credit cards or apply for loans.

**D. EXECUTION OF THE SCHEME AND ARTIFICE**

8. On or about the following dates, the Defendant executed and attempted to execute the scheme and artifice set forth above by knowingly and fraudulently conducting the transactions described in the counts below, using checks that had been unlawfully obtained:

<b>COUNT</b>	<b>DATE</b>	<b>AMOUNT</b>	<b>BANK</b>	<b>VICTIM</b>
<b>ONE</b>	July 21, 2023	\$1,448.65	Truist Bank	K.G.
<b>TWO</b>	July 15, 2024	\$3,130.47	Bank of America	B.B.

In violation of Title 18, United States Code, Sections 1344 and 2.

**COUNT 3**

(Possession of Stolen Mail - 18 U.S.C. § 1708)

From on or about July 1, 2023, until on or about August 8, 2024, in the Houston Division of the Southern District of Texas,

**BRITNI MARIE JOHNSON,**

Defendant herein, did possess checks, letters, credit cards, debit cards and other mail items, which had been stolen from the United States Mail, knowing that said items had been stolen.

In violation of Title 18, United States Code, Sections 1708 and 2.

**COUNTS 4- 5**  
**(Aggravated Identity Theft- 18 U.S.C. § 1028A)**

From on or about July 1, 2023, until on or at least about August 8, 2024, in the Houston Division of Southern District of Texas, and elsewhere,

**BRITNI MARIE JOHNSON,**

Defendant herein, did knowingly possess and use, without lawful authority, a means of identification of another, that is, the name of real persons, during and in relation to violations of 18 U.S.C. § 1344 (Bank Fraud), as described in the counts below:

<b>COUNT</b>	<b>DATE</b>	<b>NAME</b>	<b>ITEM</b>
FOUR	July 21, 2023	K.G.	Check
FIVE	July 15, 2024	B.B.	Check

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

**NOTICE OF FORFEITURE**  
**(18 U.S.C. § 982(a)(6))**

Pursuant to Title 18, United States Code, Section 982(a)(6), the United States gives notice to the defendants,

**BRITNI MARIE JOHNSON,**

that in the event of conviction of the offenses charged in Counts One through Five of this Indictment, the United States intends to seek forfeiture of all conveyances used in and of all property used to facilitate, or intended to be used to facilitate, the commission of the offenses.

**Money Judgment and Substitute Assets**

The United States gives notice that it will seek a money judgment against the defendant. In the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exist,

the United States will seek to forfeit any other property of the defendants up to the value of the property subject to forfeiture.

TRUE BILL

Original Signature on File

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FOREPERSON OF THE GRAND JURY

NICHOLAS J. GANJEI  
Acting United States Attorney

  
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JAY HILEMAN  
Assistant United States Attorney